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February 23, 2018

By ECF

The Honorable Steven M. Gold
United States Magistrate Judge
United States Court House
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Isigi v. Harry's Nurses Registry,
Inc. et al.,

16 Civ. 2218 (FB) (SMG)

Dear Magistrate Judge Gold:

We represent the defendants in this action. I write pursuant to Your Honor's Minute Entry of February 16, 2018 (Dkt. No. 84) to advise the court that Defendants do have an interest in settling this matter, however have insisted that prior to any offer of settlement, Plaintiffs' counsel file with both the Office of the Clerk of the County of Queens, New York, and the Clerk of the Court of the Eastern District *legal, proper and binding* satisfactions of judgment in the *Gayle* matter *which would be wholly effective as against each and every plaintiff in the judgment*. In this regard, defendants have inquired whether the attorney for the plaintiffs in the *Gayle* litigation has exceeded his powers in providing certain satisfaction of judgments that were previously rejected by the clerk's office and whether he will be protected from future claims of the Plaintiffs. *See De Mets v. Dragon*, 53 N.Y. 635 (1873); *Allison Lewis*, 15 How. Pr. 539 (Sup. Ct. 1858.) Defendants reiterate that there is a pending pro-se motion before Magistrate Go, where defendants have, among other things, asserted that Counsel Bernstein, as agent, has transcended his warrant in providing the satisfactions of judgment and have demanded to see the proof (via cancelled check) of the exact and *full payment* made to each of the plaintiff nurses.

Thank you for your attention to this matter.

Respectfully submitted,

/s/

Edward Irizarry

CC: Jonathan Bernstein, Esq. (ECF)
Harry Dorvilier